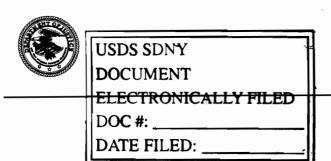
U.S. Department of Justice



United States Attorney
Southern District of New York

86 Chambers Street New York, New York 10007

April 1, 2008

ORIGINAL

Hon. Kenneth M. Karas United States District Judge United States Courthouse 300 Quarropas Street, Chambers 533 White Plains, NY 10601

MEMO ENDORSED

Re:

Belov v. Quarantillo, 07 Civ. 10292 (KMK)

Dear Judge Karas:

I write respectfully to request a sixty-day extension of time, from April 1 to June 2, to respond to the complaint in the above-referenced civil action. This is a mandamus action in which the plaintiffs, husband and wife, seek an order compelling Citizenship and Immigration Services ("CIS") to adjudicate their applications for adjustment of status.

The Government's answer was initially due on February 1, 2008, and prior to that date, plaintiff Vladmir Belov's application was adjudicated and, in fact, granted. Accordingly, we requested a sixty-day extension of time to provide CIS additional time to adjudicate Tamara Belova's adjustment application. The Court granted the Government's request on February 24, 2008.

CIS has informed me that Tamara's application was granted on March 20, 2008. A copy of the first page of Tamara's adjustment of status application, which indicates that it was approved, is attached. Plaintiffs' counsel, Jacqueline Meyer, has informed me that although Tamara's application for adjustment of status has been approved, she is unwilling to withdraw this action until Tamara is in physical possession of her green card.

In light of the fact that CIS has approved both plaintiffs' applications and that Tamara should receive her green card shortly which would permit the parties to resolve this case, we respectfully request an additional sixty-day extension of time. Plaintiffs' counsel consents to this request.

I thank the Court for its consideration of this request.

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Respectfully,

MICHAEL J. GARCIA United States Attorney for the Southern District of New York

By: _____

KIRTI VAIDYA REDDY Assistant United States Attorney (212) 637-2751

cc: Jacqueline Meyer, Esq. (via facsimile)

Enclosure

. A J.

INNETH M. KARAS U.S.

@002/002 Page 3 of 3 04/01/2008 06:16 FAX 7:07257410292-KMK IDOCLIFICATION Filed 04/03/2008

A96-649-147 - sent

tegister commanent Kesidence or Adjust Status

TIERE - Please type or print in black ink.			FOR USCIS USE ONLY		
Part 1. Information about you.			Returned	Receipt	
Family Name Give	en Name Amara	Middle Name Artemovna			
Address - C/O					7 ==
Street Number and Name 22 Joan Avenue		Apt.		Resubmitted	I-485
City	/				6-017
White Plains	7i- Cala		4	Reloc Sent	1-485
State New York	Zip Code 10607			Refor Sent	289
Date of Birth mm/dd/yyyy/ Country of Birth: Belarus 08/24/1949 Country of Citizenship/Nationality: Bearus					
U.S. Social Security # 089-82-8735	A # (if any)	19-147		Reloc Rec'd	10/07
Date of Lasi Arrival (mm/dd/yyy) 07/29/2005	1-94 # 42127164911	7 7 1 1 1		Reloc Recu	10/07/2005
Current USCIS Status G-4	Expires on (mm/dd/yyyy) D/S				-
Part 2. Application Type. (check one)			Applicant Interviewed	200	
I am applying for an adjustment to permanent resident status because:			following 4, 6 ce	ğ	
 a. X an immigrant petition giving me an immediately available immigrant visa number has been approved. (Attach a copy of the approval notice, or a relative, special immigrant juvenile or special immigrant military visa petition filed with this application that will give you an immediately available visa number, if approved.) b. my spouse or parent applied for adjustment of status or was granted lawful permanent residence in an immigrant visa category that allows derivative status for spouses and children. 			Section of Law □ Sec. 209(b), IN □ Sec. 13, Act of □ Sec. 245, INA □ Sec. 24ct of □ Sec. 2 Act of □ Other □ Other	11/2:66 HOCCAL	
c. I entered as a K-1 fiancé(e) of a United States citizen whom I married within 90 days of entry, or i am the K-2 child of such a fiancé(e). (Attach a copy of the fiancé(e) petition approvainotice and the marriage certificate).				Country Charges	TRP
d. I was granted asylum or derivative asylum status as the spouse or child of a person granted asylum and am eligible for adjustment				Eligibility Under Approved Visa	
e. I am a native or citizen of Cuba admitted or paroled into the United States after January 1, 1959, and thereafter have been physically present in the United States for at least one year.			Dependent of F Special Immigr Other	rincipal Alien - (2)	
f. 1 am the husband, wife or minor unmarried residing with that person, and was admitted 1959, and thereafter have their physically p	or paroled into the Unit	ed States after January es for at least one year	# A	Oriment of Nori Action Block	neland security
1 have continuously resided in the United States since before January 1, 1972.			A Park	AED. J	
h. Cother basis of eligibility. Explain. (If additi paper.)	onal space is needed, use	e a separate piece of	A Citize	MAN 2 U	
I am already a permanent resident and am app permanent residence adjusted to the date I orig nonimmigrant or parolee, or as of May 2, 1964, i. 1 am a native or citizen of Cuba and meet the j. 1 am the husband, wife or minor unmarried (f), above.	inally arrived in the Un whichever date is later the description in (e), above	nited States as a , and: (Check one) ve.		To Be Attorney or	e Completed by Representative, if any G-28 is attached to represent